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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JORGE ROSALES,
vs.
BELLAGIO, LLC, a Nevada corporation;
Plaintiff,
Defendant.
)
Case No.: 2:17-cv-03117-JCM-GWF
)
**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGEMENT AT ECF NO.
20**
)
[FIRST REQUEST]
)

Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff JORGE ROSALES (“Plaintiff”), by and through his undersigned counsel, James P. Kemp, Esq. and Victoria L. Neal, Esq., of the law firm of Kemp & Kemp, and Defendant BELLAGIO (“Defendant”), by and through its undersigned counsel, Deverie J. Christensen, Esq. and Phillip C. Thompson of the law firm of Jackson Lewis P.C., hereby stipulate, subject to approval by the Court, to extend the time for Plaintiff to respond to Defendant’s Motion For Summary Judgment at ECF No. 20. This is the first request for an extension of time for Plaintiff to respond to Defendant’s Motion for Summary Judgement. This request is sought in good faith and not for purposes of undue delay.

1 **I. RELEVANT FACTS**

2 Discovery in this matter closed September 21, 2018 after two previous extensions were
 3 requested and granted due to the scheduling of depositions and the parties not having transcripts
 4 necessary to proceed with preparing dispositive motions. **ECF Nos. 17 and 19.** The current
 5 dispositive motion deadline was October 22, 2018, with responses due November 12, 2018
 6 (Veteran's Day).

7 **II. REASON FOR REQUEST**

8 The extension is necessary because of Plaintiff's counsels' extremely heavy workload.
 9 This includes, but is not limited to, an opening brief for the Ninth Circuit Court of Appeals, an
 10 opening brief for the Nevada Supreme Court, preparation for and conducting nine depositions
 11 (three out of state) including 30(b)(6) witnesses, defending two depositions, preparation for and
 12 attending four worker's compensation hearings, preparation for and attending an unemployment
 13 hearing, preparation for and attending an Early Neutral Evaluation conference, and an opposition
 14 to a summary judgement motion in another matter. This does not include Plaintiff's counsel's
 15 conducting their normal course of business including meeting with clients and potential clients,
 16 meet and confers with opposing counsel, witness and expert interviews, and answering and
 17 propounding formal discovery requests. In addition, there was one holiday (Nevada Day) and
 18 two more holidays (Veteran's Day and Thanksgiving) within now the requested extension time.
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1 Therefore, the parties agree that an extension of time is appropriate and stipulate that
2 Plaintiff have up to and including November 26, 2018, in which to respond to Defendant's
3 motion for summary judgment.

4 Respectfully submitted,

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6 Dated this 7th day of November, 2018.

7 KEMP & KEMP

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9
10 JACKSON LEWIS P.C.

11 /s/ Victoria L. Neal

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25 *Attorneys for Defendant*
26 *Bellagio, LLC*

27 **ORDER**

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29 **IT IS SO ORDERED:**

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31 Dated: November 7, 2018

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34 UNITED STATES DISTRICT COURT